

# Exhibit C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

Marc Veasey, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

**PLAINTIFFS AND PLAINTIFF-INTERVENORS' JOINT WITNESS LIST**

Plaintiffs and Plaintiff-Intervenors hereby identify the following categories of witnesses:

1) witnesses they intend to call live at trial; 2) witnesses they intend to call at trial or, alternatively, may be presented through deposition testimony (video, or non-video designations); 3) witnesses for whom deposition testimony will be read into the record at trial; and 4) witnesses to be presented through deposition designations who are Plaintiffs or are representatives of Plaintiff or Plaintiff-Intervenor organizations. This list does not include other individuals whose testimony will be presented through deposition designations only and who will be identified in those designations (Plaintiffs and Plaintiff-Intervenors reserve the ability to potentially read selected portions of these depositions into the record at trial).

**I. Lay Witnesses:**

**A. Organizational Witnesses:**

1. Yannis Banks (live or via deposition transcript)  
c/o Ezra Rosenberg  
Dechert LLP  
Suite 500 Carnegie Center  
Princeton, NJ 08540

Mr. Banks is employed as a staffer for the Texas State Conference of the NAACP. He will testify about the mission of the Texas NAACP and the injury suffered by the Texas NAACP as a result of Senate Bill 14, including the resources that the Texas NAACP has had to divert away from other programs as a result of SB14.

2. Linda Lydia (live or via deposition transcript)  
c/o Ezra Rosenberg  
Dechert LLP  
Suite 500 Carnegie Center  
Princeton, NJ 08540

Ms. Lydia is the Treasurer for the Texas State Conference of the NAACP. She will testify about the injury suffered by the Texas NAACP as a result of Senate Bill 14, including the additional resources that the Texas NAACP has had to devote to educating members and constituents as a result of SB14.

3. Martin Golando (live or via deposition transcript)  
c/o Ezra Rosenberg  
Dechert LLP  
Suite 500 Carnegie Center  
Princeton, NJ 08540

Mr. Golando testified is General Counsel for the Mexican-American Legislative Caucus of the Texas House of Representatives ("MALC"). Mr. Golando will testify as to the injury suffered by MALC as a result of SB 14.

4. Blake Green (live)  
Texas League of Young Voters Education Fund  
P.O. Box 20666  
Houston, TX 77225-0666

On behalf of the Texas League, Mr. Green will testify about the burdens that students and young African-American voters face in obtaining an EIC, as well as the resources required by the Texas League to help students secure such ID. He will focus on burdens particular to students who attend historically black colleges and universities (HBCUs).

5. Juanita Cox (via deposition transcript)  
Executive Director  
La Union del Pueblo Entero (LUPE)  
P.O. Box 188, San Juan, TX 78589

Ms. Cox is Executive Director for Le Union del Pueblo Entero ("LUPE"). Ms. Cox will describe the mission, policies and practices of LUPE, the impact of SB 14 on its members and the community it serves, and LUPE's activities taken to educate and assist voters after SB 14 went into effect.

6. Judge Ramon Garcia (via deposition transcript)

Texas Association of Hispanic County Judges and County Commissioners  
c/o Rolando L Rios  
115 E Travis, Ste 1645  
San Antonio, TX 78205

On behalf of the Texas Association of Hispanic County Judges and County Commissioners (TAHJC), Hidalgo County Judge Ramon Garcia will testify that the Association of county officials seeks to protect the Hispanics right to vote, free of racial discrimination. He has personal knowledge that there is no in-person voting fraud requiring the imposition SB14. All members are elected officials from the Hispanic community and are intimately familiar with the impact Texas voting laws have on the Hispanic Community. Combined, they represent millions of Hispanic voters. Texas County Judges and Commissioners are in the front lines administering voting laws and have knowledge of the impact of these laws on the Hispanic Community. SB 14 will cause them to expend time and resources to promote political participation by Hispanic citizens in Texas. SB 14 has been forced them to divert time and resources to educate the public about the new requirements and it will adversely impact the participation of the Hispanic Community.

B. Federal Legislative Witnesses:

1. Marc Veasey (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310

Marc Veasey was recently elected to Congress from the Fort Worth and Dallas metropolitan areas. When SB 14 was considered, Congressman Veasey was a member of the State House of Representatives. Congressman Veasey will testify concerning the legislative events that lead to passage of SB 14, redistricting legislation and other acts of the Legislature and their effects on minority voters. Congressman Veasey will also testify to the effects of SB14 on constituents and on his campaigns for office specifically. He will describe the burdens SB 14 imposes on his campaign and on the ability to organize and turn out his voters and minority voters in particular.

2. Jane Hamilton (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310

Ms. Hamilton is Chief of Staff for Congressman Veasey but has also been a community organizer in North Texas for several years. She will testify to the effects of SB 14 on

community and voter engagement. She will describe the burdens SB 14 imposes on campaigns she has been involved with and on the ability to organize and turn out voters.

C. Texas Legislator Witnesses:

1. Representative Rafael Anchia (live)  
c/o Jose Garza  
Law Office of Jose Garza  
7414 Robin Rest Dr.  
San Antonio, TX 98209  
(210) 392-2856

Representative Anchia will testify about the Texas House of Representatives' consideration of SB 14 and proposed amendments. Representative Anchia was elected to the Texas House of Representatives in November 2004 and represents Texas House District 103, which is a majority Hispanic district. He served on the House Elections Committee from 2005 through 2010. Representative Anchia will testify that he raised concerns about the impact of SB14 on minorities that bill proponents disregarded, and that ameliorative amendments were tabled by bill supporters with minimal debate, as well as other areas relating to the discriminatory purpose of SB 14.

2. Senator Rodney Ellis (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310

Senator Ellis will testify about the Texas Senate's consideration of SB 14 and proposed amendments. Senator Ellis has represented Senate District 13, which includes portions of Houston, since 1990. Senator Ellis is a member of the Legislative Black Caucus and has served on the Senate State Affairs committee. Senator Ellis will testify to the procedural deviations SB 14 supporters used to ensure its immediate passage through the Senate, the refusal of SB 14 supporters to investigate the impact of SB 14 on minority voters or to adopt amendments to the bill that would have ameliorated this impact, and other areas relating to the discriminatory purpose of SB 14.

3. Representative Ana Hernandez-Luna  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310

Representative Hernandez-Luna will testify about the Texas House's consideration of SB 14 and proposed amendments. Representative Hernandez-Luna will testify to the refusal of SB 14 supporters to investigate the impact of SB 14 on minority voters or to adopt amendments to

the bill that would have ameliorated this impact, and other areas relating to the discriminatory purpose of SB 14.

4. Fmr. Rep. Scott Hochberg (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068

Representative Scott Hochberg was formerly a member of the Texas House of Representatives. Representative Hochberg will testify to the procedural deviations that bill supporters used to ensure SB 14's expedited passage in the Senate, the refusal of the bill's supporters to investigate the impact of SB 14 on minority voters or to adopt amendments to the bill that would have ameliorated this impact, and other areas relating to the discriminatory purpose of SB 14. He will also testify as to the specific requirements of the statute.

5. Representative Trey Martinez Fischer (live)  
c/o Jose Garza  
Law Office of Jose Garza  
7414 Robin Rest Dr.  
San Antonio, TX 98209  
(210) 392-2856

Representative Martinez Fischer will testify about House consideration of SB 14 and proposed amendments. Representative Martinez Fischer has represented House District 116, which is majority Hispanic, since 2000. He is the chairman of the Mexican-American Legislative Caucus (MALC). Representative Martinez Fischer will testify that the procedures used by bill supporters to ensure SB 14's passage, that bill supporters disregarded concerns raised about the impact of SB14 on minorities, and that ameliorative amendments were tabled by bill supporters with minimal debate, as well as other areas relating to the discriminatory purpose of SB 14.

6. Senator Carlos Uresti (live)  
P.O. Box 12068  
Capitol Station  
Austin, Texas 78711  
(512) 463-0119

Senator Uresti will testify about the Senate's consideration of SB 14 and proposed amendments. Senator Uresti served in the Texas House of Representatives from 1997 to 2006 and has represented Senate District 19, which is majority Hispanic, since 2006. Senator Uresti will testify to the procedural deviations that bill supporters used to ensure SB 14's expedited passage in the Senate, the refusal of the bill's supporters to investigate the impact of SB 14 on minority voters or to adopt amendments to the bill that would have ameliorated this impact, and other areas relating to the discriminatory purpose of SB 14.

7. Fmr. Gov. Mark White (live)

c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068

Mark White was formerly Governor of Texas from 1983-1987. He has also previously served as Texas Secretary of State and Texas Attorney General. He was actively involved in the imposition of Section 5 preclearance requirement on Texas which he will describe in his testimony. Governor White will explain the effect of the Voting Rights Act on Texas. Governor White will also describe the process that went into to crafting the voter identification requirements prior to SB 14. Gov. White will describe the Legislative process and atmosphere involved in the passage of SB 14 and other modern election law changes. Governor White will also describe the role of race in Texas politics.

D. Texas Executive Department Witnesses:

1. Victor Farinelli (live)  
c/o John B. Scott  
Office of the Attorney General  
P.O. Box 12548  
Austin, Texas 78711-2548  
(512) 936-1695

Mr. Farinelli is the electronic registration manager of the Department of State Health Services Vital Statistics Unit. He will testify concerning the processes—including all attendant costs—for a voter to obtain a certified copy of a Texas birth record or an election identification birth certificate, the efforts undertaken to educate the public about the availability of such records, the rule amendment that created the election identification birth certificate, and limitations on use of an election identification birth certificate.

2. Joe Peters (live)  
c/o John B. Scott  
Office of the Attorney General  
P.O. Box 12548  
Austin, Texas 78711-2548  
(512) 936-1695

Mr. Peters is the assistant director at the Department of Public Safety (DPS) for the driver license division. He will testify concerning rules, regulations, notices, processes, and costs related to election identification certificates (EICs); accessibility by means of public transportation of each office or EIC mobile station in Texas at which EICs are or may be made available; budgets and staffing of offices where EICs are available; reviews and analysis and publicity concerning EIC mobile stations and extended hours at DPS offices; evaluations of the impact of the EIC program on DPS operations; coordination with other government officials regarding the EIC program; training of DPS employees regarding the EIC program; public

education, outreach, and assistance regarding the EIC program; information and data DPS has provided to the Texas Legislature or been requested to provide to the Texas legislature regarding SB 14 and earlier photographic voter identification proposals; DPS participation in analyzes of registered voters who do not possess DPS-issued photographic ID; and the ability of non-citizens to obtain DPS-issued photographic ID.

3. Tony Rodriguez (live)  
c/o John B. Scott  
Office of the Attorney General  
P.O. Box 12548  
Austin, Texas 78711-2548  
(512) 936-1695

Mr. Rodriguez is a senior manager in the driver license division at the Department of Public Safety (DPS). He will testify about guidelines, regulations, policies and procedures related to implementation of the election identification certificate (EIC) provisions of SB 14, as established under Section 521A.001 of the Texas Transportation Code, including the form and appearance of EICs; the standards and process for the issuance and renewal of EICs; the application to obtain an EIC; the information required from persons who apply for an EIC; the processing of EIC applications; the tracking and recording of applications and EIC issuance, including the demographics of applicants and volume and locations of applications; the tracking and recording of how many applicants have been given an EIC and how many applications were deficient; the standards and procedures under which an EIC may be canceled; and the expiration dates of EICs. He will also testify regarding the offices, including EIC mobile stations, in Texas at which EICs, Texas Driver Licenses, Texas personal identification cards, and Texas licenses to carry concealed handguns are available, including their respective hours of operation, wait times required to receive in-person customer service at each such location (including any preferential treatment provided to EIC applicants), the resources available for customers with limited English proficiency, and any future plans on each of these issues.

E. Elected Texas Officials: The following individuals will offer testimony at trial regarding the effect of SB 14 on their campaigns and elections, including but not limited to how SB 14 imposes significant additional burdens and costs on voters in their communities and discourages and prevents them from voting. These witnesses will also testify about the particular circumstances of their communities and how such circumstances amplify the already significant burdens of SB 14.

1. Sergio De Leon, Plaintiff (via deposition transcript)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
2. Daniel Guzman (live)  
201 Southern Avenue



Edcouch, TX 78538

3. Michael Montez, Plaintiff (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
4. Oscar Ortiz, Plaintiff (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
5. Penny Pope, Plaintiff (via deposition transcript)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310

F. Elections Officials: The following individuals will offer testimony at trial regarding the implementation of SB 14 at the county level.

1. Carolyn Guidry (via deposition transcript)  
County Clerk, Jefferson County  
P.O. Box 1151  
Beaumont, TX 77704  
(409) 835-8475
2. J.R. Harris (via deposition transcript)  
Director of Compliance, Tax Office  
1001 Preston St  
Houston, TX 77002  
(713) 368-2000
3. Debbie Newman (via deposition transcript)  
County Clerk, Jasper County  
121 N Austin St  
Jasper, TX 75951  
(409) 384-2612
4. Stan Stanart (via deposition transcript)  
County Clerk, Harris County  
1001 Preston St

Houston, TX 77002  
(713) 368-2000

G. Social Services Witnesses:

1. Rev. Peter Johnson (live)  
400 S. Zang Blvd., Suite 1202  
75208 Dallas Texas

Rev. Peter Johnson will testify about the history of racism in Texas, including the historical disenfranchisement of minorities, and about the extent to which racism in Texas continues today.

2. Kristina Mora (live)  
The Stewpot  
Community Ministries  
First Presbyterian Church  
1822 Young Street  
Dallas, TX 75201

Ms. Mora will testify as to the barriers indigent registered voters in Texas face when seeking to obtain photo IDs, including a Texas personal identification and Texas Driver License.

3. Dawn White (live)  
110 McCullough Ave.  
San Antonio, TX 78215

Ms. White is Executive Director of Christian Assistance Ministry, a faith-based organization that helps low-income Texans obtain ID. She will testify about the burdens her clients face in obtaining ID.

H. Affected Persons: The following individuals will offer testimony at trial regarding the effect of SB 14 on their ability to vote (or a loved one's ability to vote), including but not limited to the burdens they face in obtaining SB 14-required forms of photo identification and how they have been disenfranchised by SB 14:

1. Ruby Barber (live or via deposition transcript/video)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
2. Sammi Bates (via deposition transcript/video)  
c/o Ezra Rosenberg

Dechert LLP  
Suite 500  
902 Carnegie Center  
Princeton, NJ 08540

3. Gordon Benjamin, Plaintiff (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
4. Ramona Bingham (via deposition transcript/video)  
c/o Avner Shapiro  
Voting Section, Civil Rights Division  
U.S. Department of Justice, 950  
Pennsylvania Avenue, NW  
(NWB-7200)  
Washington, DC 20530
5. Evelyn Brickner, Plaintiff (via deposition transcript)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
6. Anna Burns, Plaintiff (via deposition transcript)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
7. Imani Clark, Plaintiff (live or via deposition transcript)  
P.O. Box 2528  
Prairie View, TX 77446
8. Floyd J. Carrier, Plaintiff (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
9. Calvin Carrier (live)

c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310

10. Michelle Curry (via deposition transcript/video)  
c/o Avner Shapiro  
Voting Section, Civil Rights Division  
U.S. Department of Justice, 950  
Pennsylvania Avenue, NW  
(NWB-7200)  
Washington, DC 20530
11. Jim Denton (live or via deposition transcript/video)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
12. Naomi Eagleton (via deposition transcript/video)  
c/o Avner Shapiro  
Voting Section, Civil Rights Division  
U.S. Department of Justice, 950  
Pennsylvania Avenue, NW  
(NWB-7200)  
Washington, DC 20530
13. Estela Garcia Espinoza, Plaintiff (live)  
575 W. Tampico  
Raymondville, TX 78580
14. Lionel Estrada, Plaintiff (live)  
123 Pecan St.  
Kenedy, TX 78119
15. Ken Gandy, Plaintiff (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
16. Elizabeth Gholar (live or via deposition transcript/video)  
7609 Crossmeadow Drive

Austin, TX 78750

17. Marvin Holmes (via deposition transcript/video)  
c/o Avner Shapiro  
Voting Section, Civil Rights Division  
U.S. Department of Justice, 950  
Pennsylvania Avenue, NW  
(NWB-7200)  
Washington, DC 20530
18. Sheila Korte (live)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
19. Margarito Martinez Lara, Plaintiff (live)  
391 E. Broadway  
Box 632  
Sebastian, TX 78580
20. Maximina Martinez Lara, Plaintiff (live)  
391 E. Broadway  
Box 632  
Sebastian, TX 78580
21. Eulalio Mendez, Jr., Plaintiff (live)  
13137 West 3<sup>rd</sup>  
P.O. Box 59  
Sebastian, TX 78594
22. Emilio Martinez (live)  
c/o Avner Shapiro  
Voting Section, Civil Rights Division  
U.S. Department of Justice, 950  
Pennsylvania Avenue, NW  
(NWB-7200)  
Washington, DC 20530
23. John Mellor-Crummey, Plaintiff (via deposition transcript)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310

24. Koby Ozias, Plaintiff (via deposition transcript)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
25. Hector Sanchez (live)  
c/o Avner Shapiro  
Voting Section, Civil Rights Division  
U.S. Department of Justice, 950  
Pennsylvania Avenue, NW  
(NWB-7200)  
Washington, DC 20530
26. Lenard Taylor, Plaintiff (live)  
c/o Retama Manor Nursing Center  
600 Coyote Trail  
Room A115  
Alice, TX 78332
27. Vera Trotter (live or via deposition transcript/video)  
c/o Chad W. Dunn  
Brazil & Dunn  
4201 Cypress Creek Pkwy., Suite 350  
Houston, TX 77068  
(281) 580-6310
28. Phyllis Washington (via deposition transcript/video)  
c/o Avner Shapiro  
Voting Section, Civil Rights Division  
U.S. Department of Justice, 950  
Pennsylvania Avenue, NW  
(NWB-7200)  
Washington, DC 20530

**II. Experts:** The following individuals will offer expert testimony on the subjects and opinions contained in their previously served expert reports and/or in subsequent deposition testimony, including but not limited to the summary description below.

- A. Dr. Stephen Ansolahehere  
c/o United States Department of Justice  
950 Pennsylvania Ave., N.W.

Washington, D.C. 20530

Dr. Stephen D. Ansolabehere is a Professor of Government at Harvard University, where he has taught since 2008. He earned his Ph.D. at Harvard University in 1989. Dr. Ansolabehere's areas of expertise include electoral politics and statistical methods in the social sciences. He has extensive experience with database management, record linkage and database matching, data validation, and integration of Census and electoral data. He has published more than 60 articles in refereed journals on subjects including on matching survey data to voter files, validation of voting records, and statistical techniques for analyzing aggregate election and population data.

Dr. Ansolabehere will testify about the database matching conducted in this case, racial disparities in possession of SB 14 ID by Texas voters, rates of registration and voting by race, the academic literature regarding the photo voter identification laws, and the impact of SB 14 on voters in Texas.

B. Matt A. Barreto, PhD  
Department of Political Science  
University of Washington  
Box 353530  
Seattle, Washington  
(909) 489-2955

Dr. Matt Barreto is an Associate Professor of Political Science and Director of the Washington Institute for the Study of Ethnicity, Race & Sexuality at the University of Washington. He received his Ph.D. in Political Science, with an emphasis on racial and ethnic politics in the United States, political behavior and public opinions from the University of California, Irvine.

In this case, Drs. Matt Barreto and Gabriel Sanchez conducted a public opinion survey concerning the current rates of possession and lack of possession of photo ID required by SB 14 and burdens related to obtaining the photo ID required by SB 14 ("the Barreto/Sanchez Survey"). Dr. Barreto will testify to the methods and procedures utilized to undertake the survey and the results there from.

C. Dr. Coleman Bazelon  
1850 M Street NW  
Suite 1200  
Washington, DC 20036  
Tel 1.202.955.5050

Dr. Bazelon holds a Ph.D. and M.S in Agriculture and Resource Economics from the University of California Berkeley and a Diploma in Economics from the London School of Economics and Political Science. He is currently a principal at The Brattle Group, an economic consulting firm. As a practicing economist for the past two decades, he has testified before federal and state courts and arbitrators and has advised regulatory and legislative bodies,

including the U.S. Congress and the U.S. Federal Communications Commission. In carrying out his economic analyses, he regularly utilizes statistical analysis and works with large data sets.

Dr. Bazelon will testify about the costs of travel in obtaining an EIC and will demonstrate that African Americans have a higher share of cost as a proportion of wealth. Dr. Bazelon will also be able to lend additional support for Dr. Ansolabehere's data analysis.

D. Dr. Barry Burden  
c/o United States Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530

Dr. Burden is a Professor of Political Science at the University of Wisconsin-Madison. He earned his Ph.D. from The Ohio State University in 1998. Dr. Burden's area of expertise is in American politics with a focus on elections and voting, public opinion, representation, partisanship, and research methodology. He is the author of *Personal Roots of Representation* (2007 Princeton University Press), co-author of *Why Americans Split Their Tickets* (2002 University of Michigan Press), and co-editor of *The Measure of American Elections* (2014 Cambridge University Press), along with approximately 40 articles in scholarly peer-reviewed journals.

Dr. Burden will testify to the manner in which SB 14 operates within the larger set of historical and demographic conditions in Texas, as well as how SB 14 compares to other strict voter ID laws adopted in the United States and the nexus between SB 14 and the justifications asserted by the State.

E. Dr. Vernon Burton  
107 Baywood Circle  
Ninety Six, SC 29666-8755

Dr. Burton is the Creativity Professor of Humanities, History, Sociology, and Computer Science at Clemson University and serves as the Director of the Clemson CyberInstitute. Dr. Burton's research and writing focus on American History and particularly on race relations. For the past four decades Dr. Burton has taught courses in U.S. History, Southern History, race and politics, the civil rights movement, race relations, discrimination, ethnicity, family, and community. Dr. Burton is a Senior Research Scientist at the National Center for Supercomputing Applications and was the founding Director of the Institute for Computing in Humanities, Arts, and Social Science at the University of Illinois, and currently chairs the Advisory Board.

Dr. Burton will testify about evidence of discrimination under the Senate factors, including Texas's long history and modern day state-sponsorship of discrimination in voting, including through SB 14, as well as how SB 14 interacts with various socioeconomic factors to cause an inequality for voters of color in the political process. He will also testify about the history of discrimination in voting at historically Black colleges and universities (HBCUs) in Texas.



- F. Daniel G. Chatman, PhD.  
Asst. Professor of City & Regional Planning  
University of California, Berkeley  
410A Wurster Hall  
#1850  
Berkeley, California

Dr. Chatman is a tenured Associate Professor of City and Regional Planning at the University of California, Berkeley. Dr. Chatman will testify as to the differences in travel burden by racial/ethnic category and also by poverty level of the Texas Citizens of Voting Age Population in obtaining an EIC.

- G. T. Ransom Cornish, C.P.A., J.D.  
One Sugar Creek Center Boulevard, Suite 340  
Sugar Land, Texas 77478  
(281) 207-1954

Ransom Cornish, C.P.A., J.D. is a practicing accountant and attorney for over twenty years. He has extensive experience giving testimony in accounting and audit matters. He has testified in state and federal court and he has been accepted as an expert in financial calculations and analysis. He has also testified concerning public appropriations and their effect on legal and factual issues in a Voting Rights Act case.

Mr. Cornish is qualified to testify on analysis of appropriation and expenditure data concerning the implementation of SB 14. He is also qualified to testify concerning analysis and calculation of provisional ballot data that exists before and after implementation of SB 14.

- H. Dr. Chandler Davidson  
c/o United States Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530

Dr. Davidson is a professor emeritus of sociology and political science at Rice University. He earned his Ph.D. from Princeton in 1969. Dr. Davidson's area of expertise includes race and politics, particularly in Texas. He has received research grants from the National Science Foundation and The National Endowment for the Humanities, among others. In 1995, the Legislative Studies Section of the American Political Science Association named a book that he co-edited, *Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990*, winner of its annual prize for the best book in legislative studies published the previous year. It is a collection of essays, including one that Dr. Davidson authored, on the impact of the Voting Rights Act of 1965. Since retiring from teaching in 2003, Dr. Davidson has been invited to testify on voting issues before the Texas Senate Committee of the Whole, as well as before U.S. Senate and House committees.

Dr. Davidson will testify about the legislature's purpose in adopting SB 14, its prior attempts to pass photo voter identification legislation, the sequence of events leading to SB

14's passage, and the justifications for SB 14. He will also testify about related historical background of minority voting rights in Texas.

I. Yair Ghitza  
c/o United States Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530

Yair Ghitza is Chief Scientist at Catalist LLC, a data services company that collects, standardizes, and analyzes data from official voter registration databases, as well as other commercial, public, and private data sources. Mr. Ghitza has successfully defended his dissertation, and will shortly be receiving a Ph.D. from Columbia University in Political Science. His areas of expertise include statistical methods and American politics. His academic work has been published in peer-reviewed journals such as the American Journal of Political Science and Statistics, Politics and Policy.

Mr. Ghitza will testify about the reliability of Catalist's individual race estimations for Texas registered voters.

J. Dr. Jane Henrici  
c/o United States Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530

Dr. Henrici, an anthropologist with over two decades of experience, is a Senior Research Affiliate with the Institute for Women's Policy Research and a Professorial Lecturer at George Washington University. Dr. Henrici received her Ph.D. in Anthropology from the University of Texas at Austin. Her research has focused on issues of poverty, including as it affects racial and ethnic groups. She has authorized and co-authored numerous reports, books, book chapters, evaluations, and policy recommendations. She has significant experience conducting research in Texas, including substantial interview and observation hours within homes, recreational facilities, schools, stores, churches, child care centers, and social services offices.

Dr. Henrici will testify about the obstacles that low-income Texans, who are disproportionately Black and Hispanic, face in obtaining identification as required under SB

K. Michael C. Herron, PhD.  
Dartmouth College  
Department of Government  
201 Silsby Hall  
Hanover, NH 03755  
(603) 646-2693

Michael C. Herron, PhD. is the William Clinton Story Remsen 1943 Professor in the Department of Government at Dartmouth College. Dr. Herron earned his PhD Business (Political Economics) from Stanford University in January, 1998. He has extensive experience

with database management, record linkage and database matching, data validation, and integration of Census and electoral data.

Dr. Herron will testify about the database matching conducted in this case, racial disparities in possession of SB 14 ID by Texas voters, rates of registration and voting by race, the academic literature regarding the photo voter identification laws, and the impact of SB 14 on voters in Texas.

L. Kevin G. Jewell  
507 Zennia St  
Austin TX 78751

Mr. Jewell works as a solo practitioner applying economic and quantitative analysis to questions in business, policy, and litigation. He has worked at CRA International and other firms doing similar work. He has worked as a consultant on litigation matters for twelve of the past seventeen years. His policy work has largely focused on low-income households' interactions with housing and other markets. He holds a MBA from the McCombs School of Business at the University of Texas in Austin, Texas and an A.B. in Mathematical Economics from Brown University in Providence, Rhode Island.

Mr. Jewell's testimony will quantify and contextualize the costs the Texas voter ID law places on specific individual named plaintiffs in this case.

M. George Korbel  
220 Gardenview  
San Antonio, Texas 78213 (210) 445-6532

George Korbel is a private practicing civil and voting rights attorney. Mr. Korbel has been involved in the legal struggle in Texas to ensure equal access to the ballot. Mr. Korbel had an handled as a lawyer, or testified as an expert witness, in scores of Voting Rights Act cases in Texas beginning with *White v. Register* and continuing until present. Mr. Korbel has recently been accepted as an expert witness in the statewide redistricting cases.

Mr. Korbel will testify as to the matters in his report, including the history of discrimination in voting in Texas, the legislative intent behind SB 14 as well as the legislative process utilized to enact the bill, and the burdens of SB 14 on Texas minority citizens.

N. Allan J. Lichtman  
Department of History  
American University  
9219 Villa Dr.  
Bethesda, MD 20817

Allan J. Lichtman received his PhD from Harvard University in 1973 with a specialty in modern American history and quantitative methods. He became an Assistant Professor of History at American University in 1973 and a Full Professor in 1980. He was the

recipient of the Scholar/Teacher of the year award for 1992-93. He has published seven books and several hundred popular and scholarly articles. He has been an expert witness in more than 75 civil and voting rights cases.

Dr. Lichtman will testify about the legislature's purpose in adopting SB 14, its prior attempts to pass photo voter identification legislation, the sequence of events leading to SB 14's passage, amendments consider to SB 14 and the justifications for SB 14. He will also testify about related historical background of minority voting rights in Texas.

O. Lorraine Carol Minnite, PhD  
401 Cooper Street, Rm. 102  
Camden, NJ 08102

Dr. Minnite is an associate professor in the Department of Public Policy and Administration at Rutgers, The State University of New Jersey-Camden. One of Dr. Minnite's areas of expertise is American Politics, with a specialization in elections and the political process. She specifically studies the incidence and effect of voter fraud in American elections. In recent years she has co-authored a study and published a report and a full-length scholarly book, entitled *The Myth of Voter Fraud*, analyzing the evidence of voter fraud nationwide.

Dr. Minnite will testify regarding the existence of voter fraud in Texas and nationwide.

P. Gabriel Ramon Sanchez, PhD  
Department of Political Science  
University of New Mexico  
Box MSC05 3070  
Albuquerque, New Mexico  
(505) 277-5104

Dr. Gabriel R. Sanchez is an Associate Professor of Political Science Executive Director of the Robert Wood Johnson Center for Health Policy at the University of New Mexico. He received his Ph.D. in Political Science, with an emphasis on racial and ethnic politics in the United States, political behavior, and public opinion from the University of Arizona.

In this case, Drs. Matt Barreto and Gabriel Sanchez conducted a public opinion survey concerning the current rates of possession and lack of possession of photo ID required by SB 14 and burdens related to obtaining the photo ID required by SB 14 ("the Barreto/Sanchez Survey"). Dr. Barreto will testify to the methods and procedures utilized to undertake the survey and the results there from.

Q. Dr. Gerald R. Webster  
c/o United States Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530

Dr. Webster is a Professor of Geography at the University of Wyoming. He earned his Ph.D. from the University of Kentucky in 1984. Dr. Webster's area of expertise is in political geography. He is the author of over 80 articles in refereed journals, book chapters, and edited volumes, and in 2011, he received the lifetime Achievement Award of the Southeastern Division of the Association of American Geographers.

Dr. Webster will testify Dr. Burden will testify concerning obstacles associated with obtaining an Election Identification Certificate due to the residential patterns of different racial and ethnic groups, access to a motor vehicle, and poverty. He will also testify concerning the geographic correlation between greater concentrations of voters on Dr. Ansolabehere's no match list and greater concentrations of particular racial groups and socioeconomic characteristics.

R.     Randall Buck Wood  
          Ray & Wood  
          2700 Bee Caves Road  
          Austin, Texas 78746  
          (512) 328-8877

Buck Wood is a practicing election lawyer in Texas with over forty years of experience in election law. Mr. Wood was formerly the Director of Elections for the Texas Secretary of State. Since that time, Mr. Wood has handled countless election related legal matters including election contests in state court and in the Legislature.

Mr. Wood will testify as to the matters contained in his expert report including the circumstances giving rise to the adoption of SB 14. Mr. Wood will also testify as to the existence of election fraud and in particular the lack of voter impersonation in Texas as well as the ease of detecting for voter fraud activities.